

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION
(St. Louis)**

**IN RE: CELEXA AND LEXAPRO : MDL DOCKET NO. 1736
PRODUCTS LIABILITY LITIGATION : ALL CASES
:
: Judge Rodney W. Sippel
:**

**DEFENDANTS' MOTION TO EXCLUDE TESTIMONY
OF PLAINTIFFS' EXPERT, DAVID HEALY, MD**

Pursuant to Rules 402, 403, and 702 of the Federal Rules of Evidence, Defendants Forest Laboratories, Inc., and Forest Pharmaceuticals, Inc. (collectively "Defendants" or "Forest") move the Court for an order excluding the testimony of plaintiffs' expert witness, David Healy, MD. The motion is supported by the accompanying memorandum and exhibits and the Declaration of Jeffrey R. Schaefer.

Dated: October 12, 2012

Respectfully submitted,

/s/ John R. Ipsaro

Joseph P. Thomas

John R. Ipsaro

ULMER & BERNE LLP

600 Vine Street, Suite 2800

Cincinnati, Ohio 45202

(513) 698-5104

(513) 698-5105 fax

jpthomas@ulmer.com

jiipsaro@ulmer.com

***Attorneys for Forest Laboratories, Inc.,
and Forest Pharmaceuticals, Inc.***

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Defendants' Motion to Exclude Testimony of Plaintiffs' Expert, David Healy, MD, was filed and served electronically this 12th day of October, 2012, upon attorneys who have completed ECF registration as required by the Court.

/s/ John R. Ipsaro, Esq.

John R. Ipsaro, Esq.